

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEXINGTON INSURANCE COMPANY,

Plaintiff,

v.

DAVID FORREST, T. BEAUCLERC ROGERS IV,
STANLEY MUNSON, MARTIN FINK, all
individually, and NEW BEGINNINGS
ENTERPRISES LLC, A California Limited Liability
Company, and TARLO LYONS, a partnership,

Defendants.

CIVIL ACTION

NO. 02-CV-4435

(Hon. Anita B. Brody)

**DEFENDANT NEW BEGINNINGS ENTERPRISES LLC'S
APPLICATION FOR ADMISSION OF COUNSEL PRO HAC VICE**

Defendant New Beginnings Enterprises LLC ("NBE"), by its undersigned counsel, hereby makes this application, pursuant to Rule 83.5.2 of the Local Rules of Civil Procedure for the United States District Court for the Eastern District of Pennsylvania, for the admission pro hac vice of Charles A. Adamek, Esquire, and Beverly Y. Lu, Esquire. In support of this application, NBE avers as follows:

1. Charles A. Adamek is a partner and Beverly Y. Lu is an associate with the firm of Lord, Bissell & Brook LLP, at its office located in Los Angeles, California.

2. Mr. Adamek and Ms. Lu are members of good standing of the Bar of the State of California and the Bars of the United States Court of Appeals for the Ninth Circuit and the United States District Court for the Central District of California. In addition, Mr. Adamek is a member in good standing of the Bars of the State of Illinois, the Court of Appeal, California, the United States Court of Appeals for the Seventh Circuit, and the United States District Courts for the Northern District of Illinois, the Northern District of California, the Southern District of California, and the Eastern District of California.

3. Mr. Adamek and Ms. Lu are fully familiar with the facts and legal issues involved in this case. In addition, Mr. Adamek and Ms. Lu are well experienced in the areas that form the subject matter of this action.

4. The undersigned counsel will continue as associate counsel as required by Local Rule 83.5.2(a).

5. Accordingly, NBE hereby files this application and respectfully requests that the Court enter the accompanying Order, formally admitting Mr. Adamek and Ms. Lu pro hac vice.

WHEREFORE, defendant New Beginnings Enterprises LLC, respectfully requests that this Court enter an Order in the form attached hereto admitting Charles A. Adamek and Beverly Y. Lu as counsel pro hac vice on its behalf for all purposes in connection with the above-referenced matter.

Respectfully submitted,

AK 2450

Alexander Kerr, I.D. No. 00634
Stephen P. McFate, I.D. No. 80806
McCarter & English, LLP
Mellon Bank Center
1735 Market Street, Suite 700
Philadelphia, PA 19103
215.979.3800

Attorneys for Defendant,
New Beginnings Enterprises LLC

Of Counsel:

Charles A. Adamek
Beverly Y. Lu
Lord, Bissell & Brook LLP
Los Angeles, CA 90071

Dated: July 14, 2004

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ORDER

AND NOW, this ____ day of _____, 2004, upon consideration of the Application for Admission of Counsel Pro Hac Vice of Defendant New Beginnings Enterprises LLC, it is hereby ORDERED that Charles A. Adamek, Esquire and Beverly Y. Lu, Esquire are admitted to the practice of law before the United States District Court for the Eastern District of Pennsylvania, pro hac vice, for all purposes in connection with the above referenced action.

BY THE COURT:

, J.

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**MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANT NEW BEGINNINGS ENTERPRISES LLC'S
APPLICATION FOR ADMISSION OF COUNSEL PRO HAC VICE**

As set forth in the foregoing Application, Mr. Adamek and Ms. Lu are members of good standing of the Bar of the State of California and the Bars of the United States Court of Appeals for the Ninth Circuit and the United States District Court for the Central District of California. In addition, Mr. Adamek is a member in good standing of the Bars of the State of Illinois, the Court of Appeal, California, the United States Court of Appeals for the Seventh Circuit, and the United States District Courts for the Northern District of Illinois, the Northern District of California, the Southern District of California, and the Eastern District of California. Mr. Adamek and Ms. Lu are fully familiar with the facts and legal issues involved in this case. In addition, Mr. Adamek and Ms. Lu are well experienced in the areas that form the subject matter of this action. As required by Local Rule 83.5.2(a), the undersigned counsel will continue as associate counsel.

Accordingly, defendant New Beginnings Enterprises LLC hereby files this application and respectfully requests that the Court enter the accompanying Order, formally admitting Mr. Adamek and Ms. Lu pro hac vice.

Respectfully submitted,

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Alexander Kerr, I.D. No. 00634
Stephen P. McFate, I.D. No. 80806
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1735 Market Street, Suite 700
Philadelphia, PA 19103
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Attorneys for Defendant,
New Beginnings Enterprises LLC

Of Counsel:

Charles A. Adamek
Beverly Y. Lu
Lord, Bissell & Brook LLP
Los Angeles, CA 90071

Dated: July 14, 2004

CERTIFICATE OF SERVICE

I, Alexander Kerr, hereby certify that on this 14th day of July, 2004, I caused a true copy of the foregoing Application for Admission of Counsel Pro Hac Vice to be served by United States first class mail, postage prepaid, upon the following counsel:

Jeffrey R. Lerman, Esquire
Montgomery, McCracken, Walker & Rhoads, LLP
123 South Broad Street
Avenue of the Arts
28th Floor
Philadelphia, PA 19109

Edward P. Krugman, Esquire
Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005

Edward M. Dunham, Jr., Esquire
Duane Morris LLP
Suite 4200
One Liberty Place
Philadelphia, PA 19103

James J. Rohn, Esquire
Conrad O'Brien Gellman & Rohn, P.C.
16th Floor
1515 Market Street
Philadelphia, PA 19102

David L. Pennington, Esquire
Harvey, Pennington, Cabot, Griffith & Renneisen, Ltd.
11 Penn Center
29th Floor
1835 Market Street
Philadelphia, PA 19103

Neil G. Epstein, Esquire
Eckert, Seamans, Cherin & Mellott, LLC
9th Floor
1515 Market Street
Philadelphia, PA 19102

AK 2450
Alexander Kerr

PH1: 482681.01